

**UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re:

GENESIS GLOBAL CAPITAL,  
LLC *et al.*,

Debtor.

Chapter: 11

Case No. 23-10064

*(Joint Administration Pending)*

**NOTICE OF APPEARANCE AND  
REQUEST FOR SERVICE OF NOTICES AND PLEADINGS**

**PLEASE TAKE NOTICE** that the undersigned attorneys of POLSINELLI PC hereby enter their appearance, pursuant to section 1109(b) of Chapter 11 of Title 11 of the United States Code (the “**Bankruptcy Code**”) and Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), on behalf of Caramila Capital Management LLC (“**Caramila**”). The below attorneys request, pursuant to Bankruptcy Rules 2002, 3017, and 9007, and sections 342, 1102(a)(1), and 1109(b) of the Bankruptcy Code, that copies of all notices and pleadings given or filed in this case be given and served upon the following persons at the addresses, facsimile numbers, or electronic mail addresses set forth below:

Jeremy R. Johnson  
Polsinelli PC  
600 Third Avenue, 42nd Floor  
New York, NY 10016  
Telephone: (212) 684-0199  
[jeremy.johnson@polsinelli.com](mailto:jeremy.johnson@polsinelli.com)

Christopher A. Ward  
Polsinelli PC  
222 Delaware Avenue, Suite 1101  
Wilmington, DE 19801  
Telephone: (302) 252-0920  
[cward@polsinelli.com](mailto:cward@polsinelli.com)

**PLEASE TAKE FURTHER NOTICE** that, pursuant to section 1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules specified above but also includes, without limitation, any notice, application, complaint, demand, motion, petition, pleading, or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, delivery, electronically, telephone, telegraph, telex, or otherwise filed or made with regard to the referenced case and proceedings therein.

**PLEASE TAKE FURTHER NOTICE** that neither this notice of appearance nor any subsequent appearance, pleading, claim or suit is intended or shall be deemed to waive the Busch Firm's (i) right to have final orders in non-core matters entered only after de novo review by a higher court; (ii) right to trial by jury in any proceeding so triable, whether or not the same be designated legal or private rights, or in any case, controversy or proceeding related hereto, notwithstanding the vel non of such matters as "core proceedings" pursuant to 28 U.S.C. § 157(b)(2)(H) and whether such jury trial right is pursuant to statute, the United States Constitution, or common law; (iii) right to have the reference withdrawn in any matter subject to mandatory or discretionary withdrawal; (iv) other rights, claims, actions, defenses, setoffs, or recoupments to which the Busch Firm is or may be entitled under agreements, in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved. Also this entry shall not be deemed to be implied consent to jurisdiction for any Stern v. Marshall category of claims that the bankruptcy court may not have authority to adjudicate.

Respectfully submitted,

Date: January 22, 2023

POLSINELLI PC

By: /s/ Jeremy R. Johnson  
Jeremy R. Johnson  
Polsinelli PC  
600 Third Avenue, 42nd Floor  
New York, NY 10016  
Telephone: (212) 684-0199  
[jeremy.johnson@polsinelli.com](mailto:jeremy.johnson@polsinelli.com)

COUNSEL FOR CARAMILA  
CAPITAL MANAGEMENT LLC

**CERTIFICATE OF SERVICE**

I hereby certify that on January 22, 2023 a true and correct copy of the foregoing *Notice of Appearance and Request for Service of Papers* has been served electronically via the Court's CM/ECF system.

By: /s/ Jeremy R. Johnson  
Jeremy R. Johnson